

**To:** Kamke, Sherry[Kamke.Sherry@epa.gov]  
**From:** Egan, Robert  
**Sent:** Fri 10/23/2015 2:36:34 PM  
**Subject:** Tower Standard meeting with DNR, LDF Tribe and REI

Sherry,

Below is a summary of the meeting and next steps for the Tower site, based on our discussions with the project team yesterday. Please let me know if you have any of the information is inaccurate or unclear.

Meeting at the Rhinelander WDNR Service Center Office, October 22, 2015.

Attendees:

Region 5

Bob Egan

Sherry Kamke (via conference call)

WDNR

John Robinson

Judy Fassbender

Greer Lundquist

Connie Antonuk

LDF

Larry Wawronowicz

Dee Allen

Kristen Hanson

REI

Dave Larsen

Ken Lassa

The team met to discuss results from the September soil boring and sampling effort, proposed locations for the PECFA-funded monitoring well network to be installed in November, and potential activities to be initiated once well results become available. The discussion was frank but cordial, and I believe that all parties were fairly satisfied with the results of the meeting. Below are the items of discussion and what was decided:

- Most of the meeting time was spent discussing the soil sampling results and using the results to determine locations for well nests in a preliminary effort to re-establish a monitoring network at and near the site.
- As a starting point, REI proposed 10 well nest locations with 3 wells per nest to define the vertical and horizontal extent of contamination. As REI described it, this was only to begin discussion and not meant as a final proposal. DNR believed that 7 locations with 2 wells per location would be sufficient as a start, but stressed that additional wells would be placed if the initial network is not adequate. I explained that we and the tribe had initially planned to have 4 well locations with 3 wells per location as a start with follow-up wells as necessary.
- After much discussion about the benefits of certain well locations based on what is known about the current site contamination, PECFA will fund 7 well locations with 2 wells per location. One well will be at the water table and one well will be placed at the inferred depth of the most contaminated portion of the plume. Wells will be placed in the source area, side-gradient, and downgradient to the lake shore. Additional wells and depths will be added as necessary after sampling is complete and we all have a chance to meet about the results.
- I stated that I will be conferring with the tribe to decide whether we need to place additional wells immediately and/or sample for additional parameters than are planned for the PECFA sampling, using our trust fund.

- The team agreed that we would share keys for all the wells, no matter who installed them, so each of the entities could access the wells for sampling or other well testing (slug tests, water level measurements, etc.)
- PECFA well installation is scheduled to begin the first week of November. No date has yet been set for sampling the wells.
- I asked DNR whether they would consider a removal action based on what we know about residual contamination at the source area. They stated that they are seriously considering that as an option, but would not implement it until spring 2016. They would prefer to get the wells in first and phase other activities later, and avoid the winter weather and freezing ground which would hamper excavation.
- We discussed roles and responsibilities. I tried to explain why we need to work with the owners directly and not through REI, and the purpose of our letter to the Kozaks naming them as RPs, with the requirement to provide a site assessment plan and ability to pay information, along with consent for access to the property. LDF explained their need to receive information directly from REI as representatives of the owner and not through the DNR. John Robinson asked if we would consider the PECFA work as satisfying the requirement for the Kozaks to submit a site assessment plan. I generally agreed but was not definitive in my answer, saying that the attorneys would need to provide an opinion on this. I also stated our ability to seek cost reimbursement but that I did not know whether we would pursue it.
- We made tentative plans to meet again in February 2016 to discuss the next phase of work.
- After the meeting, I asked LDF to consider what was decided at the meeting for the PECFA work and let me know what field activities on our part they feel are essential to implement immediately. I will most likely need to amend our task order now that we have a plan from PECFA. We could shift money to a removal action but with the time to amend the task order and get it approved, then wait for a work plan and subcontractor scheduling, we would be in the coldest part of the winter before we could begin field work. The tribal NR staff has been receiving a number of inquiries from the tribal council asking when contamination will be removed and wants to be responsive. However, I believe that they understand the timeframe issue and the limitations that winter will create. Larry did not seem overly concerned that removal may occur in spring, but I do not think he had sufficient time to consider the pressure that they may receive from council members to act quickly. Much may depend on his effort to explain the process and what can reasonably be expected to be completed in the short term.